

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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In re:	:
Shawanda Tatum	: CHAPTER 13
	:
Debtor(s)	:
	:
	: BANKRUPTCY NO.:16-10057 JKF
	:

**DEBTORS' OBJECTION TO MOVANT'S CERTIFICATION OF DEFAULT**

Debtor, by her attorney, Erik B. Jensen, Esq. by way of answer to Movant's motion, respectfully represents that:

1. Denied. Debtor has funds to cure arrears.

WHEREFORE, Debtors prays that Movant's request be denied.

Date: 12/28/2017

Respectfully submitted.

/S/ Erik B. Jensen, Esq.  
Erik B. Jensen, Esq.  
1500 Walnut St. Suite 1920  
Philadelphia, PA 19102